

Serial No.: 09/654,205
Art Unit: 2174

REMARKS

Claims 1, 3-6, 8-11, 14, 15 and 17 are pending in the present application.
Claims 2, 7, 12, 13 and 16 are cancelled.

It is respectfully requested that Applicants' arguments of record be incorporated herein.

Claims 1, 3, 4-6, 8-12, 14, 15, and 17 are rejected under 35 USC 103(a) as being unpatentable over U.S. Patent No. 6,154,771 to Rangan et al., hereinafter "Rangan", in view of U.S. Patent No. 6,175,840 to Chen et al., hereinafter "Chen". Applicants respectfully traverse this rejection.

Claim 1 provides a method for indicating the location of time dependent video hypervideo hyperlinks to a user. The method includes displaying a video presentation, including a hypervideo hyperlink emphasis region, on at least a portion of a display device screen, and providing the user, at time of viewing, with at least one user selectable display attribute for the hypervideo hyperlink emphasis region. The at least one of the user selectable display attribute includes at least one of:

brightening the hypervideo hyperlink emphasis region in relation to other portions of said hypervideo,

displaying the hypervideo hyperlink emphasis region in gray scale only format, and

displaying the hypervideo hyperlink emphasis region in reverse-color mode format.

Rangan discloses digital hypervideo, including hyperlinks, i.e., "hotspots", visible on the scene display that may normally be followed by clicking on the hotspot with a

computer mouse (col. 8, line 66 – col. 9, line 7). Scene changes within the streaming hypervideo and representative scenes are separately displayed as thumbnails, and by pointing and clicking on the thumbnails, a user can replay or record past scenes (col. 9, lines 12-20). Hyperlinks may display a text annotation when a user locates the cursor over the hyperlink (col. 13, lines 64-66). Hyperlinks may be imbedded in the digital data or in the overt displays, and user may set the hypervideo viewer to accentuate or suppress the hyperlinks, in a manner remotely analogous to the way that cookies may be accepted or rejected by an internet browser during browsing (col. 15, lines 1-18). A grid, coloration, or some other visually perceptible “clue” may overlay or alter a hyperlink object (col. 15, lines 27-30).

Although Rangan discloses hotspots associated with video hyperlinks, Rangan does not disclose user selectable display attributes as provided in claim 1. In particular, although Rangan discloses a grid, coloration, or other visual clue, Rangan does not disclose a) brightening the hypervideo hyperlink emphasis region in relation to other portions of the hypervideo, b) displaying the hypervideo hyperlink emphasis region in gray scale only format, and c) displaying the hypervideo hyperlink emphasis region in reverse-color mode format, as recited in claim 1.

Chen discloses a method that includes displaying a motion video presentation on a first portion of a display device, where the device presentation includes a hot link region, and displaying an indication of the presence of the hot link region in the video presentation (col. 2, lines 38-45). The method may also include altering a visual attribute of at least a portion of the hot link region when a user manipulatable cursor is within the first portion (col. 2, lines 46-49). The video is contained within a display window. If the cursor is inside the display window when a hot-link is in the video, that region is high-lighted by either a color change or an easily observed border (col. 3, lines 45-48).

Chen discloses a hot-link region highlighted by either a color change or an easily observed border. However, Chen does not disclose a) brightening the hypervideo

Serial No.: 09/654,205
Art Unit: 2174

hyperlink emphasis region in relation to other portions of the hypervideo, b) displaying the hypervideo hyperlink emphasis region in gray scale only format, and c) displaying the hypervideo hyperlink emphasis region in reverse-color mode format, as recited in claim 1.

Neither Rangan nor Chen disclose a method for indicating the location of hypervideo hyperlinks to a user, "wherein at least one of said user selectable display attribute comprises at least one of brightening the hypervideo hyperlink emphasis region in relation to other portions of said hypervideo, displaying said hypervideo hyperlink emphasis region in gray scale only format, and displaying said hypervideo hyperlink emphasis region in reverse-color mode format," as recited in claim 1. Therefore, neither Rangan nor Chen, whether considered individually or in combination, disclose or suggest the limitations of claim 1. Therefore, claim 1 is patentable over the cited combination of Rangan and Chen.

Claims 6, 11 and 15 include recitals similar to those provided in claim 1. For at least reasoning provided in support of the patentability of claim 1, claims 6, 11 and 15 are also patentable over the cited combination of Rangan and Chen.

Claims 3-5 depend from claim 1, claims 8-10 depend from claim 6, claims 12 and 14 depend from claim 11, and claim 17 depends from claim 15. For at least reasoning provided in support of the patentability of claims 1, 6, 11 and 15, claims 3-5, 8-10, 12 and 14 are also patentable over the cited combination of Rangan and Chen.

For the reasons set forth above, it is submitted that the rejection of claims 1, 3, 4-6, 8-12, 14, 15, and 17 were rejected under 35 USC 103(a) as being unpatentable over Rangan in view of Chen is overcome. Applicant respectfully requests that the rejection of claims 1, 3, 4-6, 8-12, 14, 15, and 17 be reconsidered and withdrawn.

Serial No.: 09/654,205
Art Unit: 2174

Claims 2, 7, 13, and 16 are rejected under 35 USC 103(a) as being unpatentable over Rangan in view of Chen as applied to claim 1, and in further view of Trueblood et al. (hereinafter, Trueblood).

Claims 2, 7, 13 and 16 are cancelled, and subject matter from these claims was incorporated into independent claims 1, 6, 11 and 15, respectively. Therefore, Applicants will address the Office Action's rejection in the context of claims 1, 6, 11 and 15.

As discussed above, neither Rangan nor Chen disclose a method for indicating the location of hypervideo hyperlinks to a user, "wherein at least one of said user selectable display attribute comprises at least one of brightening the hypervideo hyperlink emphasis region in relation to other portions of said hypervideo, displaying said hypervideo hyperlink emphasis region in gray scale only format, and displaying said hypervideo hyperlink emphasis region in reverse-color mode format," as recited in claim 1.

Trueblood discloses a graphic display system for anti-aliasing correction on cathode ray tube displays, which generates image display data, including data representing the intensity of each pixel of the display, a raster scan graphic display for displaying the image data, and anti-aliasing means. The improvement includes gamma correction means supplied with the anti-aliased display data for correcting for non-linearity in the relationship between the pixel intensity data and the actual intensity of the corresponding pixel of the raster scan display (col. 2, lines 5-17).

The Office Action indicates that Trueblood teaches gray-scale format and reverse-color mode format. However, Trueblood simply acknowledges the existence of a gray-scale, and the general ability to reverse colors. There is no teaching in either Rangan, Chen or Trueblood of the desirability to incorporate gray-scale or reverse-color format in the hypervideo system of Rangan. The Office Action has provided no further evidence of any desirability of combining gray-scale or reverse-color format with

the hypervideo system of Rangan. Therefore, the Examiner's postulation is based in hindsight and lacks motivation.

The Office Action suggestion to use gray-scale format and reverse-color format, allegedly disclosed in Trueblood, in combination with the hypervideo system of Rangan or Chen is based on the hindsight of Applicants' disclosure. Such hindsight reconstruction of the art cannot be the basis of a rejection under 35 U.S.C. 103. The prior art itself must suggest that modification or provide the reason or motivation for making such modification. In re Laskowski, 871 F.2d 115, 117, 10 USPQ 2d 1397, 1398-1399 (CAFC, 1989). "The invention must be viewed not after the blueprint has been drawn by the inventor, but as it would have been perceived in the state of the art that existed at the time the invention was made." Sensonics Inc. v. Aerosonic Corp. 38 USPQ 2d 1551, 1554 (CAFC, 1996), citing Interconnect Planning Corp. v. Feil, 774 F. 2d 1132, 1138, 227 USPQ 543, 547 (CAFC, 1985).

Furthermore, there is no motivation to combine the teachings of Rangan and Trueblood, because the goals of Trueblood are diametrically opposed to those of Rangan and Chen. Trueblood is concerned with the improvement of anti-aliasing techniques that reduce the appearance of "jaggy" or "staircase" lines. Trueblood specifically tries to avoid using colors to add any kind of visual indication to an image, as is a goal of both Rangan and Chen. For example, Trueblood discloses a benefit of proper gamma compensation, which "is the same gamma correction function can be applied to accurate color mixing that is continuous throughout the gray scale. This allows simple shading of objects in the display **without changing the apparent color mix** . . . (col. 6, lines 16-22)." The method of Trueblood has the opposite goal of that in Rangan and Chen: to improve picture quality **without** the addition of easily perceivable modifications or indications to the image.

As described above, the aims and goals of Trueblood are completely different from those of Rangan or Chen. Thus, there would be no motivation for one skilled in the art to look to Trueblood in order to improve the hypervideo system of Rangan.

Serial No.: 09/654,205
Art Unit: 2174

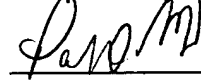
Therefore, claim 1 is patentable over the cited combination of Rangan, Chen and Trueblood.

Claims 6, 11 and 15 include recitals similar to those provided in claim 1. For at least reasoning provided in support of the patentability of claim 1, claims 6, 11 and 15 are also patentable over the cited combination of Rangan, Chen and Trueblood.

In summary, it is respectfully submitted that all of the pending claims 1, 3-6, 8-11, 14, 15 and 17 clearly distinguish over the cited and relied upon references for at least the reasons expressed above. Accordingly, reconsideration and withdrawal of the 35 USC 103(a) rejections is requested, and the allowance of claims 1, 3-6, 8-11, 14, 15 and 17 is earnestly solicited.

5/27/05
Date

Respectfully submitted,



Paul D. Greeley
Attorney for Applicant(s)
Registration No. 31,019
Ohlandt, Greeley, Ruggiero & Perle, L.L.P.
One Landmark Square, 10th Floor
Stamford, CT 06901-2682
(203) 327-4500